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File No. 096216B

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

In re:

CASE NO. 18-11629-RG

Franklin Medina

CHAPTER 11

DEBTOR

CERTIFICATION OF COUNSEL
IN OPPOSITION TO
DEBTOR'S REQUEST FOR LOSS
MITIGATION EXTENSION

Rob Saltzman, of full age, hereby certifies as follows:

1. I am an attorney, licensed to practice law in the State of New Jersey, am a member of the firm of Pluese, Becker & Saltzman, LLC and am responsible for the representation of the Mortgagee, MTGLQ Investors, L.P, by and through their servicer, Selene Finance LP, (collectively the "Mortgagee") in the above-captioned matter. I make this Certification from my own personal knowledge based upon documents contained in my file and am authorized to make this Certification on behalf of the Mortgagee.

2. On February 1, 2015, the Debtor and Co-Mortgagor, Taryn Medina, were approved for a Loan Modification. The Loan Modification reduced the adjustable interest rate from 6.5% to 2% for 60 months, to 3% for 12 months, and to 3.85% through the remaining term of the modified Mortgage. The term of the Mortgage obligation was extended from 30 years to 48 years. The balance of \$149,100 was deferred until the

amount of \$386,233.42 is paid in full. The Debtor's first payment on the Loan Modification was due on February 1, 2015. *See Exhibit "A,"* Loan Modification.

3. The Debtor's loan is contractually due for the November 1, 2015 and the Debtor has requested to have the loan reviewed for a second Loan Modification. On March 5, 2018, the Debtor filed a Notice of Request for Loss Mitigation and on March 28, 2018, an Order allowing the Debtor into the Program was entered.

4. The Loss Mitigation file was submitted into the DMMPortal on March 29, 2018.

5. The file was opened in the DMMPortal by the Mortgagee on April 2, 2018.

6. On April 4, 2018, the Mortgagee provided an incomplete notice, which was uploaded into the Portal on April 11, 2018. *See Exhibit "B,"* Incomplete Notice.

7. The Debtor's attorney's office uploaded additional loss mitigation documents into the Portal on April 18, 2018.

8. On April 23, 2018, the Mortgagee provided a second incomplete notice, which was uploaded into the Portal on May 2, 2018. *See Exhibit "C,"* Incomplete Notice.

9. The Debtor's attorney's office uploaded additional loss mitigation documents into the Portal on May 3, 2018.

10. On May 1, 2018, the Mortgagee provided a third incomplete notice, which was uploaded into the Portal on May 10, 2018. *See Exhibit "D,"* Incomplete Notice.

11. On May 10, 2018, the Mortgagee provided a fourth incomplete notice, which was uploaded into the Portal on May 15, 2018. *See Exhibit "E,"* Incomplete Notice.

12. On May 22, 2018, the Debtor was denied for loss mitigation for the following reason: Borrower

failed to return completed Financial Workout Package and Supporting Documentation. *See Exhibit "F,"* Denial Letter.

13. On June 14, 2018, the Debtor filed the current Application for Extension of the Loss Mitigation Period.

14. The Debtor's attorney states that the Debtor can only provide tax returns through the year of 2014. Unfortunately, until the Debtor can provide the last two years' of tax returns, the Mortgagee will not be able to review the loan for loss mitigation.

I hereby certify that the foregoing statements are true and correct to the best of my knowledge, information, and belief. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

DATED: June 18, 2018

Respectfully submitted,

Pluese, Becker & Saltzman, LLC

By: /s/ Rob Saltzman

Rob Saltzman, Esquire